

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

UNITED STATES OF AMERICA,)

v.) 1:22-CR-155

GINGER CARLIN,) Honorable Anthony Trenga

**MOTION TO CHANGE HOME INCARCERATION TO HOME
DETENTION WITH TIMEOUTS**

COMES NOW, Ginger Carlin, through counsel, and moves this Honorable Court to change her terms of confinement from home incarceration to home detention with timeouts. Currently, Ms. Carlin can only leave her house to attend substance abuse treatment meetings. She is unable to transport her son to school or school related activities or for him to attend other activities; such as, friend's birthday parties or medical appointment. Ms. Carlin has had to turn to people who attend her substance abuse treatment meeting to transport her son, as her mother and father often refuse to do so.

Counsel for Ms. Carlin has spoken to Probation Officer Kenneth Orsino and was informed there is no objection by Probation to changing her confinement from home incarceration to home detention with 'timeouts' – allowing her to transport her son to school, to activities and medical appointments.

Wherefore, Ginger Carlin, through her counsel moves this Honorable Court for entry of and order changing Ms. Carlin's home incarceration to home detention with timeouts.

Respectfully submitted,

Ginger Carlin
By Counsel

PETROVICH & WALSH, P.L.C.

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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of December, 2022, an electronically filed with the Court and a copy was then forwarded to:

Bibeane Metsch
Madeleine Case
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